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search either invention would encompass the other invention as well. Because a different field of search is not required, there is no serious burden as required by MPEP § 803. Reconsideration and withdrawal of the election requirement is respectfully requested.

Non-elected claims 1-10 will be retained pending resolution of the traversal.

The Examiner has objected to claim 19 because of informalities. In response, applicant has amended claim 19 to overcome the noted informality.

The Examiner has rejected claims 11-19 under 35 U.S.C. § 112, second paragraph, as being indefinite. This ground of rejection is respectfully traversed in light of the present amendment.

The Examiner has objected to the use of the term "coupling" in claim 11. While it is respectfully submitted that the term coupling is well known in the art and is supported in the present specification, applicant has nevertheless amended claim 11 to recast the phrasing of this element. Claim 11 now recites a means for coupling an outlet of the mixing chamber. The "designed to direct" language has also been deleted.

With respect to claim 14, the Examiner contends that the language "condensing said liquid" is vague and indefinite. The Examiner recommends use of acceptable structural language, i.e., "for condensing said liquid." However, applicant notes that claim 14 reads "a heat exchanger for receiving the combination of said cleaning gas and said liquid droplets with particulate from the structure and condensing said liquid and the particulate from said cleaning gas" (emphasis added). Thus, the "and" between "structure" and "condensing" indicates that the heat exchanger is for receiving the combination of cleaning gas and liquid droplets, and for condensing the liquid and the particulate from the cleaning gas.

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Accordingly, it is submitted that claims 11 and 14 are definite within the meaning of 35 U.S.C. § 112, second paragraph.

The Examiner has rejected claims 11, 12 and 14-18 under 35 U.S.C. § 102(e) as being anticipated by Landaas. This ground of rejection is respectfully traversed.

Independent claim 11 recites a system for cleaning a structure. The system comprises a cleaning gas accumulator for retaining a cleaning gas and a mixing chamber for combining the cleaning gas with liquid droplets. A coupling is included to couple an outlet of the mixing chamber to the structure. The coupling is designed to direct the combination of cleaning gas and liquid droplets to one or more surfaces of the structure to be cleaned in a sheeting manner.

Landaas discloses a system having an expansion separator 2 that supplies gas to a mixing head 18 via a pump 3 and liquid to the mixing head 18 via a pump 12. The mixing head 18 combines the gas and liquid into an aerosol fog. The aerosol fog is directed to a fluid system A,B for treating internal surfaces thereof.

Applicant respectfully submits that Landaas fails to anticipate independent claim 11 for the following reasons. First, Landaas does not disclose the claimed cleaning gas accumulator. The Examiner acknowledges that Landaas does not expressly disclose a gas accumulator but takes the position that Landaas must inherently have such a gas source since a gas source would be required for operation. Applicant respectfully disagrees with this position. Landaas describes the system as being a closed system, which means that the gas and liquid is continuously cycled through the system. Thus, once the system is charged with gas and liquid, a separate source of gas generally would not be required. The only time additional gas would need to be added would be to make up for losses that may occur over time; presumably, any such losses would

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be minimal. Furthermore, a gas accumulator is not the only type of gas source available. Therefore, even assuming for the sake of argument that Landaas did inherently require a separate gas source, it is not inherent that the gas source would necessarily need to be a gas accumulator. The prior art simply does not teach or suggest using a gas accumulator.

Second, Landaas does not teach combining the cleaning gas with liquid droplets as required by claim 11. While Landaas does suggest combining gas with liquid, there is no suggestion that the liquid is in droplet form.

For the above reasons, it is respectfully submitted that independent claim 11 allowable over Landaas. Claims 12 and 14-18 depend from claim 1 and are thus also believed to be allowable. Furthermore, at least some of these dependent claims set forth limitations not met by the prior art. For instance, claim 14 recites that the system includes a heat exchanger for condensing liquid and the particulate from the cleaning gas. The Examiner asserts that the expansion separator 2 of Landaas corresponds to the claimed heat exchanger. However, although the expansion separator 2 performs a similar function as the heat exchanger of the present invention, the expansion separator 2 is not a heat exchanger. The name suggests that expansion separator condenses liquid via expansion rather than heat removal.

The Examiner has rejected claim 13 under 35 U.S.C. § 103(a) as being unpatentable over Landaas in view of Bergman et al and claim 19 under 35 U.S.C. § 103(a) as being unpatentable over Landaas in view of Bartos et al. These grounds of rejection are respectfully traversed.

The Examiner relies on Bergman et al and Bartos et al for teaching use of gas filters and heaters and cleaning turbine buckets, respectively. As such, neither of these two references overcomes the above-described deficiencies of the Landaas of not disclosing a gas accumulator or mixing liquid droplets. Thus, Landaas modified by Bergman et al and Bartos et al, still fail to

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render claim 11 unpatentable. Because they both depend from claim 11, it is submitted that claims 13 and 19 are also allowable of the prior art.

In view of the above, it is submitted that the claims are in condition for allowance. Reconsideration of the objections and rejections is requested. Allowance of claims 1-19 at an early date is solicited.

Respectfully submitted,

3/5/03

Date

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VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE CLAIMS:

Claims 11 and 19 has been amended as follows:

Claim 11 (once amended). A system for cleaning a structure comprising:

a cleaning gas accumulator for retaining a cleaning gas;
a mixing chamber for combining said cleaning gas and liquid

droplets; and

means for [a] coupling [to couple] an outlet of said mixing chamber to the structure, wherein [said coupling is designed to direct] the combination of said cleaning gas and said liquid droplets is directed to one or more surfaces of the structure to be cleaned in a sheeting manner.

Claim 19 (once amended). The system of claim 11 wherein the structure is a gas turbine bucket.